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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**RESCAP BORROWER CLAIMS TRUST’S OBJECTIONS TO THE DECLARATION
OF NAWAZ RAJA**

Pursuant to the Court’s order during the Pre-Trial Conference held on February 1, 2016 at 9 a.m. eastern standard time, the ResCap Borrower Claims Trust (the “Borrower Trust”) submits the following objections to certain paragraphs of the *Declaration Under Penalty of Perjury as Direct Testimony of M. Nawaz Raja and Offer of Proof By Expert Testimony* [Docket No. 9555] (as amended by Docket No. 9585 filed on February 5, 2016).

Paragraph Number	Objection(s)	Specific Sentence Within Paragraph
16	Legal conclusion, irrelevant	
18	Irrelevant	
19	Irrelevant, lack of personal knowledge	
20	Irrelevant, lack of personal knowledge	
21	Irrelevant, speculation	
22	Irrelevant, lack of personal knowledge	
23	Irrelevant	
24	Irrelevant, lack of personal knowledge, improper opinion/conclusion	

25	Irrelevant	
26	Irrelevant	
27	Irrelevant, lack of personal knowledge	
28	Irrelevant, lack of personal knowledge, improper conclusion, speculation	Conclusion objection applies to sentence: "That would mean that Homeowners either received or were denied modifications improperly."
30	Irrelevant, legal conclusion	
31	Irrelevant, legal conclusion	
32	Irrelevant	
33	Irrelevant	
34	Irrelevant	
35	Irrelevant	
36	Irrelevant, legal conclusion	
37	Irrelevant, lack of personal knowledge, improper opinion	
38	Irrelevant, legal conclusion, improper opinion	
39	Irrelevant, improper opinion	
40	Irrelevant, lack of personal knowledge	
41	Irrelevant, legal conclusion	
42	Irrelevant	
43	Irrelevant, lack of personal knowledge	
44	Irrelevant, lack of personal knowledge	
45	Irrelevant, lack of personal knowledge	
46	Irrelevant, lack of personal knowledge	
47	Irrelevant, lack of personal knowledge	
48	Irrelevant, lack of personal knowledge	
49	Irrelevant, lack of personal knowledge	
50	Irrelevant, lack of personal knowledge	
51	Irrelevant, lack of personal knowledge	
52	Irrelevant, lack of personal knowledge, legal conclusion	

53	Irrelevant, lack of personal knowledge, legal conclusion	
54	Irrelevant, lack of personal knowledge	
55	Irrelevant, legal conclusion	
56	Irrelevant, lack of personal knowledge, improper opinion	
57	Irrelevant, lack of personal knowledge	
58	Irrelevant, lack of personal knowledge, legal conclusion, improper opinion	
59	Irrelevant, lack of personal knowledge, improper opinion	
60	Irrelevant, lack of personal knowledge, improper opinion	
61	Irrelevant, lack of personal knowledge, legal conclusion	
62	Irrelevant, lack of personal knowledge, legal conclusion	
63	Irrelevant, lack of personal knowledge, improper opinion	
64	Irrelevant, lack of personal knowledge, hearsay	
65	Irrelevant, lack of personal knowledge, improper opinion	
66	Irrelevant, legal conclusion	
67	Irrelevant, lack of personal knowledge	
68	Irrelevant, lack of personal knowledge, improper opinion	
69	Irrelevant, lack of personal knowledge, improper opinion	
70	Irrelevant, lack of personal knowledge, improper opinion	
71	Irrelevant, lack of personal knowledge, improper opinion	
72	Irrelevant, lack of personal knowledge	
73	Irrelevant, lack of personal knowledge, improper opinion	
74	Irrelevant, lack of personal knowledge, improper opinion	
75	Irrelevant, lack of personal knowledge, improper opinion	
76	Irrelevant, lack of personal	

	knowledge	
77	Irrelevant, improper opinion	
78	Irrelevant, legal conclusion	
79	Irrelevant, legal conclusion	
80	Irrelevant, legal conclusion	
81	Irrelevant, lack of personal knowledge, improper opinion	
82	Irrelevant, lack of personal knowledge, improper opinion	
83	Irrelevant, lack of personal knowledge, legal conclusion, improper opinion	
83	Irrelevant, lack of personal knowledge, improper opinion.	
84	Irrelevant, lack of personal knowledge	
85	Irrelevant, lack of personal knowledge	
86	Irrelevant, lack of personal knowledge, speculation	Speculation objection applies to sub-part c only.
87	Irrelevant, lack of personal knowledge	
88	Irrelevant, lack of personal knowledge	
89	Irrelevant, legal conclusion	
90	Irrelevant, legal conclusion	
91	Irrelevant, legal conclusion	
92	Irrelevant, legal conclusion	
93	Irrelevant, legal conclusion	
94	Irrelevant, legal conclusion, improper opinion	
95	Irrelevant, lack of personal knowledge	
96	Irrelevant, lack of personal knowledge	
97	Irrelevant, lack of personal knowledge	
98	Irrelevant, lack of personal knowledge, improper opinion	
99	Irrelevant, lack of personal knowledge, improper opinion	
100	Irrelevant, lack of personal knowledge	
101	Irrelevant, lack of personal knowledge	

102	Irrelevant, lack of personal knowledge, improper opinion	
103	Irrelevant, lack of personal knowledge	
104	Irrelevant, lack of personal knowledge, refers to documents not in evidence, improper opinion	
105	Irrelevant, lack of personal knowledge	
107	Irrelevant, lack of personal knowledge, hearsay	Hearsay objection begins with the sentence: "Ms. Smith did not consent to the electronic transfer of her collateral documents..."
108	Irrelevant, lack of personal knowledge, hearsay	

Dated: February 5, 2016
New York, New York

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